

Judith W. Ross  
State Bar No. 21010670  
Frances A. Smith  
State Bar No. 24033084  
Eric Soderlund  
State Bar No. 24037525  
**Ross & Smith, PC**  
700 N. Pearl Street, Suite 1610  
Dallas, Texas 75201  
Telephone: 214-377-7879  
Facsimile: 214-377-9409  
Email: judith.ross@judithwross.com  
frances.smith@judithwross.com  
eric.soderlund@judithwross.com

Michelle Hartmann  
State Bar No. 24032402  
**BAKER & MCKENZIE LLP**  
1900 North Pearl  
Suite 1500  
Dallas, TX 75201  
Telephone: 214-978-3000  
Facsimile: 214-978-3099  
Email: michelle.hartmann@bakermckenzie.com

Debra A. Dandeneau  
**BAKER & MCKENZIE LLP**  
452 Fifth Ave  
New York, NY 10018  
Telephone: 212-626-4875  
Email: debra.dandeneau@bakermckenzie.com  
(Admitted pro hac vice)

**COUNSEL FOR SCOTT ELLINGTON, THOMAS SURGENT,  
FRANK WATERHOUSE, AND ISAAC LEVENTON**

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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<b>In re: Highland Capital</b>	§	<b>Case No. 19-34054-sgj-11</b>
<b>Management, L.P.,</b>	§	
	§	<b>Chapter 11</b>
<b>Debtor.</b>	§	
	§	

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**SENIOR EMPLOYEES' WITNESS AND EXHIBIT LIST FOR  
THE HEARING SCHEDULED FOR JANUARY 26, 2021 AT 9:30 A.M.  
(PREVAILING CENTRAL TIME)**

Scott Ellington, Thomas Surgent, Frank Waterhouse, and Isaac Leventon (collectively, the "Senior Employees") file this Witness and Exhibit List for the hearing scheduled on **Wednesday, January 26, 2021 at 9:30 am.**

**Senior Employees' Witness List**

At the hearing, Senior Employees may call the following persons to testify as witnesses:

1. Isaac Leventon;

2. James Seery, Jr.;
3. J.P. Sevilla;
4. Any witness designated or called by any other party; and
5. Any rebuttal witnesses, as necessary.

**Senior Employees' Exhibit List**

<b>EXHIBIT</b>	<b>DESCRIPTION OF EXHIBIT</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>
SE1	Plan of Reorganization of Highland Capital Management, L.P. [Docket No. 944]			
SE2	First Amended Plan of Reorganization of Highland Capital Management, L.P. [Docket No. 1079]			
SE3	Second Amended Plan of Reorganization of Highland Capital Management, L.P. [Docket No. 1287]			
SE4	Third Amended Plan of Reorganization of Highland Capital Management, L.P. [Docket No. 1383]			
SE5	Redline Third Amended Plan of Reorganization of Highland Capital management, L.P. [Docket No. 1385]			
SE6	Fourth Amended Plan of Reorganization of Highland Capital Management, L.P. with Exhibits thereto [Docket No. 1450]			
SE7	Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. with Exhibits thereto [Docket No. 1472]			
SE8	Redline Comparison of Second to Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.			
SE9	Debtor's Notice of Filing of Plan Supplement to the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. and exhibits thereto [Docket No. 1606]			
SE10	Senior Employees' Limited Objection to Debtor's Fifth Amended Plan [Docket 1669]			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
SE11	Email from David Neier to Scott Ellington dated 11.16.2020			
SE12	Email from David Neier to Thomas Surgent dated 11.20.2020			
SE13	Bonus Award letters 2018, 2017, 2016 – Isaac Leventon			
SE14	Bonus Award Letters 2018, 2017, 2016 – Scott Ellington			
SE15	Bonus Award Letters 2018, 2017, 2016 – Frank Waterhouse			
SE16	Bonus Award Letters 2018, 2017, 2016 – Thomas Surgent			
SE17	Appointment for Claims Meeting December 2, 2020			
SE18	Isaac Leventon's Notes from Claims Meeting December 2, 2020			
SE19	Thomas Surgent's Handwritten Notes from Claims Meeting December 2, 2020			
SE20	Email from JP Sevilla to Isaac Leventon dated October 26, 2020			
SE21	Email from Jeff Pomerantz to Debra Dandeneau dated January 4, 2021			
SE22	Proof of Claim filed by Frank Waterhouse [Claim No. 182]			
SE23	Proof of Claim filed by Thomas Surgent [Claim No. 183]			
SE24	Proof of Claim filed by Isaac D. Leventon [Claim No. 184]			
SE25	Proof of Claim filed by Scott B. Ellington [Claim No. 192]			
SE26	Notice of Filing of Debtor's Amended Schedules [Docket No. 1082]			
SE27	Monthly Operating Report [Docket No. 913]			
SE28	Monthly Operating Report [Docket No. 1014]			
SE29	Monthly Operating Report [Docket 1115]			
SE30	Monthly Operating Report [Docket No. 1329]			
SE31	Monthly Operating Report [Docket No. 1493]			
SE32	Monthly Operating Report [Docket No. 1710]			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
SE33	Ballot submitted by Scott Ellington (Class 7)			
SE34	Ballot Submitted by Scott Ellington (Class 8)			
SE35	Ballot Submitted by Frank Waterhouse (Class 7)			
SE36	Ballot Submitted by Frank Waterhouse (Class 8)			
SE37	Ballot Submitted by Isaac Leventon (Class 7)			
SE38	Ballot Submitted by Isaac Leventon (Class 8)			
SE39	Ballot Submitted by Thomas Surgent (Class 7)			
SE40	Ballot Submitted by Thomas Surgent (Class 8)			
	Any exhibits produced by the Debtor or other third party after the filing of this Witness and Exhibit List			
	Any exhibits designated by any other party			
	Any exhibits necessary and appropriate as rebuttal evidence			

Respectfully submitted January 22, 2021.

By: /s/ Frances A. Smith  
 Judith W. Ross  
 State Bar No. 21010670  
 Frances A. Smith  
 State Bar No. 24033084  
 Eric Soderlund  
 State Bar No. 24037525  
**ROSS & SMITH, PC**  
 700 N. Pearl Street, Suite 1610  
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Michelle Hartmann  
State Bar No. 24032402  
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Suite 1500  
Dallas, TX 75201  
Telephone: 214-978-3000  
Facsimile: 214-978-3099  
Email: michelle.hartmann@bakermckenzie.com

Debra A. Dandeneau  
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